

June 7, 1999

Docket Office
California Energy Commission
1516 Ninth Street
Sacramento, Ca 95814-5512

RE: Docket No. 97-DC&CR-1

San Diego Gas & Electric would like to commend the Ad Hoc Information Committee's proposals to streamline the reporting requirements on generation data. Any reduction in reporting encourages, rather than hinders, the promotion of competition in the newly restructured electric utility industry. SDG&E does have, however, the following comments on the Commission's report entitled: "Proposed Generator Reporting Requirements: Biennial Power Plant Characteristics and Quarterly Generator Output and Fuel Use".

We agree in Chapter IV, with the proposal that the Energy Commission should ask the qualifying facilities for operating data directly instead of from the utilities. This protects the utility from divulging what may be considered confidential information by the qualifying facility.

SDG&E continues to have concerns about the confidentiality of certain data. Information about prices and usage is extremely sensitive. If statistical sampling were used, that would protect individual information regarding interconnected generators or customers without having to go to the generator or the customer for permission to obtain data.

We also support an equitable – or level playing field – reporting policy. We have no problem with excluding generators of less than 50 mws from CEC reporting requirements; however, reporting requirements should apply to all market participants equally regardless of whether they are regulated or not.

Regarding the Quarterly Fuel and Energy Report (QFER) Form 2, SDG&E buys all power to serve retail load from the Power Exchange except for small amounts purchased on a real-time basis from the Independent System Operator. As part of the end of rate freeze settlement at the Public Utilities Commission, SDG&E agreed to purchase all of its default retail customers' energy requirements from the PX/ISO during the interim post rate freeze period. Therefore, the Energy Commission should request information on sources of power from the Power Exchange or from the Independent System Operator.

Since San Diego Gas & Electric no longer owns any generation, except for 20 percent of the San Onofre Nuclear Generating Station, it is our opinion that generator reporting should come from the generators, not from the utilities. Therefore, generators should make their own case for confidentiality of their data.

If you have any questions, please call me at 619-696-4031. Thank you for your consideration.

Sincerely yours,

Patricia Fleming
Regulatory Affairs

Cc: Commissioner Michal Moore
Commissioner David A. Rohy
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Docket Unit (12 copies)